

Todd R. G. Hill
119 Vine Street
Belton, TX 76513
+1 [661] 899-8899
toddryangregoryhill@gmail.com
In Propria Persona

FILED
CLERK, U.S. DISTRICT COURT
2/18/2025
CENTRAL DISTRICT OF CALIFORNIA
BY RYO DEPUTY
DOCUMENT SUBMITTED THROUGH THE
ELECTRONIC DOCUMENT SUBMISSION SYSTEM

**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA**

WESTERN DIVISION

TODD R. G. HILL, et al.

CIVIL ACTION NO. 2:23-cv-01298-CV-BFM

Plaintiffs

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW, et al.,**

Defendants.

The Hon. Cynthia Valenzuela
Courtroom 5D, 5th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

PLAINTIFF'S CASE MANAGEMENT STATEMENT

NO ORAL ARGUMENT REQUESTED

CASE MANAGEMENT STATEMENT

Pursuant to paragraph 12 of the Court's order of February 6, 2025 (ECF 205), given that Plaintiff is proceeding without counsel, Plaintiff Todd R. G. Hill submits the following Separate Case Management Statement to provide the Court with an update on the current procedural posture of this case, outline outstanding issues requiring judicial intervention, and propose a framework for efficient case resolution.

1. STATUS OF THE CASE

Plaintiff's objections to the Magistrate Judge's Report and Recommendation (at Docket 213) were filed on February 14, 2025 and are pending docket number assignment at the time of this submission. The objections raise significant legal and procedural issues, including:

The erroneous application of sovereign immunity and failure to consider *Ex Parte Young* as an exception for claims against State Bar officials.

The failure to rule on unopposed judicial notice requests (Dockets 197 & 199), resulting in procedural unfairness and an incomplete factual record.

The misapplication of Title VI and Equal Protection standards, wherein the Magistrate improperly required a showing of intentional discrimination rather than disparate impact.

The premature dismissal of RICO claims despite allegations of a common enterprise between the State Bar and Peoples College of Law (PCL) to perpetuate fraudulent academic practices.

Given the potential implications of these unresolved issues, Plaintiff requests clarification on whether the Court will issue a ruling on the objections in accordance with de novo review standards under 28 U.S.C. § 636(b)(1)(C).

1.1 DEFENDANTS

Current named defendants include:

1 Board of Directors ... Peoples College of Law, Joshua Gillens, Adriana Zuniga Nunez, Brandon N.
2 Stallings, Paul A. Kramer, The Guild Law School etc., Clemente Franco, Roger Aramayo, Ruben
3 Duran, Jean Krasilnikoff, Hector C. Peña, Hector Sanchez, William Maestas, Hailyn Chen, Ellin
4 Davtyan, Christiana Marin Gonzalez, Pascual Torres, Ismael Venegas, Audrey Ching, George S.
5 Cardona, Robert Ira Spiro [Ira Spiro], Carol Deupree [deceased], Louisa Ayrapetyan, Melanie M.
6 Shelby, Devan Mcfarland, Juan Manuel Sarinana, Gary Silbiger, Natalie Leonard, Arnold Sowell, Jr.,
7 Enrique Zuniga, David Tyler Bouffard, Edith Pomposo, Leah Wilson, Mark W. Toney, Paul A.
8 Kramer.

11 **1.5 CAUSES OF ACTION AND THEIR BASIS**

12 The causes of action in this case arise from federal civil rights statutes, anti-discrimination laws,
13 and state tort claims, each of which remains central to the pending disputes.

14 A. Equal Protection Violation Under The 14th Amendment: Plaintiff asserts an Equal Protection
15 violation under 42 U.S.C. § 1983, alleging that the State Bar of California and its agents
16 engaged in practices that disproportionately harmed African American students, creating
17 systemic barriers to legal education and bar eligibility. The failure to enforce accreditation
18 and oversight policies constitutes actionable state action under color of law.

19 B. Title VI of The Civil Rights Act of 1964 - Racial Discrimination In Education: Plaintiff also
20 brings claims under Title VI of the Civil Rights Act of 1964, asserting that both Peoples
21 College of Law and the State Bar engaged in racially discriminatory conduct in an educational
22 setting that receives federal financial assistance. Title VI prohibits racial discrimination in
23 programs benefiting from federal funding, and Defendants' knowing failure to prevent and
24 address racially disparate treatment directly violates this standard.

1 C. RICO: Plaintiff further alleges violations of the Racketeer Influenced and Corrupt
2 Organizations Act (RICO), arguing that Defendants engaged in a coordinated scheme
3 involving fraud, misrepresentation, and financial exploitation of students, including the
4 falsification of academic records and obstruction of lawful student rights. The repeated and
5 deliberate nature of these actions establishes a pattern of racketeering activity under RICO.
6

7 D. Violation of Title IX Education Amendments of 1972 (20 U.S.C. § 1681): Additionally,
8 Plaintiff brings a Title IX claim against Peoples College of Law and its agents, asserting that
9 sex-based retaliation followed his efforts to expose misconduct. Title IX prohibits
10 discrimination and retaliation in education programs that receive federal funding, and Plaintiff
11 was subjected to targeted defamation and procedural interference designed to undermine his
12 standing after raising legitimate complaints.
13

14 E. Violation Of The Unruh Civil Rights Act (Cal. Civil Code § 51): At the state level, Plaintiff
15 asserts violations of the Unruh Civil Rights Act, alleging that Defendants engaged in practices
16 that denied him full and equal access to educational resources and career opportunities based
17 on race, sex, and disability status. The Unruh Act prohibits discriminatory practices in
18 business establishments, and Peoples College of Law and the State Bar fall within its
19 jurisdiction due to their regulatory and financial structures.
20

21 F. Negligence And Negligence Per Se: Negligence and negligence per se claims are also at issue,
22 as Defendants had a duty to maintain accurate records, enforce compliance, and protect
23 students from foreseeable harm, yet knowingly failed to act despite their statutory obligations.
24 Their continued inaction and misrepresentation of regulatory compliance directly resulted in
25 educational and financial harm to Plaintiff.
26

27

28

1 G. Negligent Hiring, Retention, And Supervision: Additionally, Plaintiff asserts a claim for
2 negligent hiring, retention, and supervision, arguing that Peoples College of Law and its
3 Board of Directors failed to properly vet, train, and supervise faculty and administrators,
4 leading to the pervasive misconduct and regulatory failures that form the basis of this case.

5 H. Conspiracy: A conspiracy to deprive Plaintiff of his civil rights is also alleged, as the
6 combined actions of Peoples College of Law, its officials, and State Bar affiliates demonstrate
7 a coordinated effort to suppress Plaintiff's legal education and professional advancement
8 through procedural obstruction, discriminatory enforcement, and retaliation.

9 These causes of action are grounded in well-established legal standards that directly apply to the
10 misconduct at issue. Notably, the college had its law school charter removed by the State Bar of
11 California, effective May 31, 2024, for its longstanding noncompliance.

12 Remedies sought: The Court's adjudication of pending motions, discovery disputes, and judicial
13 notice requests must reflect the significance of these claims and the necessity of a full and fair
14 resolution based on the evidentiary record. Plaintiff seeks injunctive relief against State Bar officials
15 in their individual capacities under the Ex Parte Young exception to remedy ongoing violations of
16 federal law, while monetary damages are pursued only against non-immune Defendants. Plaintiff was
17 denied an accurate transcript and a degree, resulting in financial harm, and seeks compensatory,
18 treble, and punitive damages for discriminatory practices and deliberate indifference under Title IX.
19 Declaratory relief is sought to establish that the State Bar's "non-interference" policy is unlawful, that
20 PCL's practices violate the Unruh Civil Rights Act, and that the State Bar failed in its oversight
21 obligations. Plaintiff also requests injunctive relief mandating a public acknowledgment of
22 wrongdoing, the establishment of a restitution fund for harmed students, and systemic reforms to the
23 State Bar's accreditation and oversight processes. Further, Plaintiff seeks transparency measures,

1 including audits and public reporting, and an injunction against both PCL and the State Bar to ensure
2 compliance with Title IV and Title IX. A permanent injunction is sought requiring the State Bar to
3 end its non-interference policy, implement record-keeping standards, and address bar passage
4 disparities, while PCL must cease operations, dissolve, and refund tuition. Additionally, Plaintiff
5 seeks an order compelling PCL to issue a corrected transcript and confer a Juris Doctor degree, as
6 well as requiring the State Bar to investigate and sanction responsible officials. Plaintiff also requests
7 civil penalties, the removal of Defendants from leadership positions, a judicial determination
8 regarding PCL's board election validity, indemnification for good-faith governance efforts, and
9 reimbursement of litigation costs.

10
11
12 2. PENDING MOTIONS AND ISSUES REQUIRING JUDICIAL ACTION

13 A. Defendants' Pattern of Procedural Non-Engagement

14 Despite clear obligations under Federal Rule of Civil Procedure 26(f) and Local Rule 16-2,
15 Defendants have refused to engage in meaningful pretrial coordination. Plaintiff made multiple good-
16 faith attempts to schedule case management discussions, all of which were met with obstruction,
17 delay tactics, and misrepresentation of procedural obligations. Defendant Spiro, in particular, initially
18 refused to coordinate but then submitted a premature Case Management Statement (CMS) (Docket
19 208) in an apparent attempt to feign compliance and avoid documentation of his procedural failures.

20 Further, Defendants Haight Brown & Bonesteel LLP and the State Bar of California engaged
21 in parallel non-engagement strategies, refusing to stipulate to key facts, failing to confirm their
22 participation in meet-and-confer discussions, and ultimately avoiding case management obligations
23 altogether. Plaintiff's Notice of Non-Engagement filed on February 10, 2025, documents this
24 behavior and demonstrates that Defendants are using procedural evasion to obstruct the efficient
25 management of this litigation.

1 Plaintiff submits that these tactics directly undermine Defendants' credibility in seeking
2 dismissal under Rule 12(b)(6), as their refusal to engage with case management proceedings suggests
3 a broader strategy to avoid judicial scrutiny rather than a genuine belief in legal deficiencies. Plaintiff
4 respectfully requests that the Court recognize these obstructionist tactics for what they are and take
5 appropriate action to ensure compliance with procedural obligations.
6

7 **B. Unruled Judicial Notice Requests (Dockets 197 & 199)**

8 Plaintiff's requests for judicial notice remain unruled upon, despite their material relevance to
9 the claims at issue. Judicial notice is particularly critical because these documents contain evidence of
10 the State Bar's knowledge of PCL's noncompliance and regulatory failures. The failure to rule on
11 these requests raises concerns regarding procedural fairness and the completeness of the record
12 before the Court.

13 Requested Action: Plaintiff requests that the Court formally rule on the judicial notice
14 requests and clarify whether the evidence in Dockets 197 & 199 will be considered in any
15 forthcoming rulings.

16 **C. Status of Claims Against PCL Defendants**

17 At present, Plaintiff's claims against PCL remain active, but there has been no indication from
18 Defendants as to whether they intend to move forward with discovery or file additional dispositive
19 motions. Given that the case involves allegations of fraud, misrepresentation, and civil rights
20 violations, Plaintiff seeks clarity on whether these claims will proceed independently of the Court's
21 resolution of objections related to the State Bar Defendants.

22 Requested Action: Plaintiff requests a determination as to whether the claims against PCL
23 Defendants will proceed on a separate track or be stayed pending further court rulings.

24 **D. Discovery Plan and Anticipated Disputes**

1 Plaintiff anticipates discovery disputes arising due to:
2
3 Defendants' likely refusal to provide communications and internal documents related to
4 PCL's accreditation and oversight by the State Bar.
5 The potential assertion of privilege over key evidence demonstrating regulatory failures.
6 In light of these anticipated disputes, Plaintiff proposes the following:
7
8 i. An initial phase of limited discovery focused on accreditation records, internal emails, and
9 financial transactions relevant to fraudulent enrollment practices.
10 ii. A protective order protocol to prevent overuse of privilege designations to obstruct legitimate
11 discovery requests.
12

13 Requested Action: Plaintiff requests that the Court issue a discovery scheduling order setting
14 forth deadlines for initial disclosures and outlining a mechanism for resolving anticipated privilege
15 disputes.
16

17 **3. PROPOSED CASE SCHEDULE**

18 Plaintiff proposes the following timeline for case progression:
19
20

<u>Event</u>	<u>Proposed Deadline</u>
Judicial ruling on Plaintiff's objections	Within 30 days
Initial disclosures (if applicable) ruling	Within 14 days of ruling
Limited Phase 1 discovery (accreditation and regulatory oversight records)	60 days from ruling
Summary judgment or additional dispositive motions (if any) ruling	90 days from ruling

4. SETTLEMENT AND ADR DISCUSSION

Plaintiff remains open to discussions regarding alternative dispute resolution (ADR) but notes that prior discussions with opposing counsel have been categorically rejected and is concerned that any such discussions would simply be used as a bad-faith stalling tactic. Given the systemic nature of the issues raised in this case, Plaintiff believes that settlement discussions may only be productive if Defendants are willing to acknowledge the material impact of regulatory failures and governance lapses.

5. CONCLUSION

Plaintiff respectfully requests that the Court:

- i. Issue a ruling on the pending objections and judicial notice requests.
- ii. Clarify the procedural status of claims against PCL.
- iii. Set deadlines for initial disclosures and discovery.
- iv. Address any anticipated discovery disputes in advance to prevent unnecessary motion practice.

The Plaintiff submits that addressing these matters in a structured manner will promote judicial efficiency and prevent unnecessary procedural delays.

Respectfully submitted,

Todd R. G. Hjel

February 18, 2025

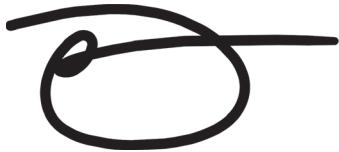
STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 2,204 words, which complies with the 7,000-word limit.

1 word limit of L.R. 11-6.1.
2

3 Respectfully submitted,
4

5
6
7
8
9



10 February 18, 2025

11 Todd R.G. Hill

12 Plaintiff, in Propria Persona

13 Plaintiff's Proof of Service

14 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-

15 3.2.1

16 Service. This document will be/has been electronically filed. The electronic filing of a
17 document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the
18 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court
19 and (2) all pro se parties who have been granted leave to file documents electronically in the case
20 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service
21 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.
22 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal
23 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

24 Respectfully submitted,

25
26
27
28



February 18, 2025

Todd R.G. Hill